

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FRANCISCO MUNDACA,

Plaintiff,

v.

THE SPIGGLE LAW FIRM, P.C.,

Defendant.

Civil Action No. 1:25-cv-2036

JOINT MOTION TO STAY PROCEEDINGS

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Plaintiff, Francisco Mundaca (“Plaintiff”) and Defendant, The Spiggle Law Firm, P.C. (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned counsel, and for good cause shown, respectfully move to temporarily stay proceedings in the above-captioned matter pending the outcome of the Parties’ mediation, scheduled for September 3, 2025, and in support thereof, state as follows:

1. Plaintiff filed his Complaint in this action on June 25, 2025. On June 26, 2025, Plaintiffs requested that Defendant waive service of process.

2. On July 2, 2025, Defendant agreed, by and through undersigned counsel, to waive service of process.

3. Pursuant to Federal Rule of Civil Procedure 4(d)(3), the deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint is currently August 25, 2025.

4. The parties have expressed mutual interest in exploring an early resolution to this case. Accordingly, the parties have scheduled a private mediation session to be conducted on

September 3, 2025.

5. In an effort to conserve resources while the Parties explore a potential resolution to this case through mediation, the Parties respectfully request that the proceedings in the above-captioned matter be temporarily stayed until mediation can be completed.

6. The parties have agreed pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 105(9) that, following completion and conclusion of the mediation, if a resolution cannot be reached, Defendant shall have thirty (30) days from the termination of mediation sessions to answer or otherwise respond to the Complaint.

7. To allow sufficient time to exhaust their attempts at settlement should the Parties determine an additional mediation session would be helpful following the currently-scheduled September 3 mediation date, the Parties request that the Court stay these proceedings, with the stay to be lifted upon the parties filing a joint line advising the Court that mediation has concluded and was not successful, at which point Defendant will have 30 days thereafter to respond to the Complaint.

8. No party will be prejudiced by the requested stay, nor is this Motion brought for purposes of delay.

9. **WHEREFORE**, the Parties respectfully request that the Court grant this Joint Motion to Stay Proceedings and temporarily stay further proceedings in this case, pending completion of the parties' mediation.

Dated: July 30, 2025

Respectfully submitted,

/s/ Desireé Langley
Melissa Washington, Esq. (Bar No. 31698)
mw@washingtonfirmpllc.com
Desireé Langley (Bar No. 31691)
dl@washingtonfirmpllc.com
THE WASHINGTON LAW FIRM, PLLC

1050 Connecticut Avenue, Suite 500
Washington, D.C. 20036
Tel: 202-770-3440
Fax: 202-991-2992

Attorneys for Plaintiff

/s/ Matthew M. May
Amy Epstein Gluck (Bar No. 20106)
Matthew M. May (Bar No. 21298)
Pierson Ferdinand LLP
Office: 601 Pennsylvania Ave. NW, Ste.900
Washington, DC 20004
Mail: 712 H Street NE # 21
Washington, DC 20002
Direct: 240-213-5233
Amy.epsteingluck@pierferd.com
matthew.may@pierferd.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Matthew M. May, certify that on July 30, 2025, I caused the foregoing to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served on all attorneys of record registered with the Court's ECF/CM system.

/s/ Matthew M. May